



## City of Rochester

City Hall Room 307A, 30 Church Street  
Rochester, New York 14614-1290  
www.cityofrochester.gov



Robert J. Duffy  
Mayor

October 15, 2010

Environmental Management Support, Inc.  
Attention: Mr. Don West  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910  
Phone 301-589-5318

Re: City of Rochester, New York - USEPA Brownfield Assessment Grant Proposal - \$400,000  
Grant Type: Assessment  
Federal Funds Requested: \$400,000 (no waiver requested)  
Contamination: Both Hazardous Substances (\$200,000) and Petroleum (\$200,000)  
Project Type: Community-wide

Dear Mr. West:

I am pleased to submit this \$400,000 brownfield assessment grant proposal from the City of Rochester, New York for your consideration. This proposed grant will provide funding for the City of Rochester New York's successful brownfield assistance program (BAP). The City of Rochester will not be requesting a cost share waiver for this project.

The proposed Community Brownfield Assistance Program (CBAP) would be available to private parties and non-profit housing developers that need environmental assessments and engineering services as they consider selling, buying, or redeveloping brownfield real estate. The CBAP would also be available to community based organizations working with the City's Quadrant Teams to address vacant, abandoned, brownfield properties and help support the City's greening and right-sizing efforts.

In the past we have found the brownfield assistance program to be an effective tool to stimulate interest in, and analysis of, brownfield sites that might otherwise be passed over for new and productive reuses that add value and improve the quality of life in our neighborhoods. Our program experience indicates that providing site investigation services is an incentive for potential investors, new owners, and those considering redevelopment to consider brownfield sites without assuming all the costs associated the assessment. Of the 32 different sites investigated through the BAP, applicants have proceeded with or are considering moving ahead with cleanup and redevelopment at 13 sites.

**As required in the proposal guidelines, we are providing the following information:**

**Applicant Identification:**

City of Rochester, New York  
Department of Environmental Services  
Division of Environmental Quality  
30 Church Street Room 300B  
Rochester, New York 14614

**Location:**

City of Rochester, New York  
County of Monroe

**DUNS number: 00-246-5805**

**Contacts:**

Project Director: Mark Gregor  
Manager, Division of Environmental Quality  
Phone number: 585-428-5978  
Fax number: 585-428-6010  
e-mail address: mgregor@cityofrochester.gov  
30 Church Street Room 300B  
Rochester, New York 14614

Mayor Robert J. Duffy  
Phone number: 585-428-7045  
Fax number: 585-428-6059  
email address: duffyr@cityofrochester.gov  
City of Rochester, New York  
30 Church Street Room 307A  
Rochester, New York 14614

**Date Submitted:** October 15, 2010  
(Submitted to EPA via U.S. Postal Service).

**Project Period:** October 1, 2011 - September 30, 2014  
**City of Rochester Population:** 207,291 (2009 Census  
ACS estimate)

We appreciate EPA's continued leadership and support of our past brownfield efforts, and appreciate the opportunity to share our successes with EPA. Please let me know if you need additional information or have questions regarding this application.

Thank you again for your consideration.

Sincerely,



Robert J. Duffy  
Mayor

Enclosure

xc: Ramon Torres, EPA Region 2  
Bill Ansbro, Budget Bureau  
Paul Holahan, Commissioner, DES  
M. Gregor, DEQ

**City of Rochester, New York  
Community-Wide Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program**

**October 15, 2010**

**Narrative Proposal**

**III. C. Threshold Criteria for Assessment Grants**

**1. Applicant Eligibility**

The City of Rochester is an incorporated general purpose unit of local government in New York State.

**2. Letter from the State or Tribal Environmental Authority**

An acknowledgment letter from Donna Weigel, Director of the Bureau of Program Management for the New York State Department of Environmental Conservation is provided as an attachment.

**3. Site Eligibility and Property Ownership Eligibility (Site- Specific Proposals Only)**

This is a community-wide assessment grant proposal.

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**V.B. Ranking Criteria for Assessment Grants**

**1. Community Need**

**1.a. Health, Welfare and Environment**

**1.a.i) Describe the effect brownfields currently have on your targeted community...**

In Rochester New York there are approximately 6,000 commercial and industrial properties that cover about 5,900 acres of land. *Of the 6,000 properties, the City's Division of Environmental Quality (DEQ) identified in August 2010, 3,875 brownfield properties having potential environmental issues that impair property values and reuse.* Based on the 2010 review and a GIS analysis, the majority of Rochester's brownfield properties are less than one acre in size, located adjacent to or within 2000 feet of residences, and within or adjacent to the City's most disadvantaged neighborhoods. These vacant brownfield properties become locations for drug trafficking and abuse, vandalism, arson, and theft including the disturbance of asbestos and other contaminated materials to order to strip copper pipes & fixtures, scrap aluminum, iron, and steel. The disturbance and release of asbestos and other contaminants has occurred repeatedly at dozens of vacant properties and brownfield sites. These releases have and continue to pose exposure hazards to neighborhood children, utility workers, City environmental services crews, police, and fire fighters.

In 2005, Rochester ranked as having the highest risks posed to humans in the Northeast, according an evaluation by USEPA using its Risk Screening Environmental Indicators which is based on Toxics Release Inventory (TRI) data. This method of assigning risk to geographic areas considers the number of people exposed and affected by the amount and toxicity of its current and past pollution. EPA's evaluation concluded that toxic air emissions were the primary source of exposure. As a result of these findings Rochester applied for and was awarded an EPA Community Action for a Renewed Environment (CARE) project.

2010 Rochester City School District statistics indicate that 4,658 or 14% of children in kindergarten

through 12<sup>th</sup> grade have asthma and that this trend continues to increase from year to year. Among Pre-kindergarten to 6<sup>th</sup> graders the prevalence is even greater, 15.7 %. The State-wide asthma rate for children is 11% and nationally the prevalence is 9.1% suggesting that school aged children in the City of Rochester are at a greater risk. According to the African American Health Task Force 2003 report, “the hospitalization rate for asthma in Monroe County [which includes the City of Rochester] is still more than three times greater among African Americans than among the non-African American population.” Minorities comprise over 50% of the population in the City of Rochester. Prior to the Rochester’s 2005 lead law in the City over 1,000 children were lead poisoned each year, with lead poisoning rates in some neighborhoods exceeding 35%. Rates of lead poisoning have decreased since the enactment of the law but are still a significant concern. Eighty-five percent of lead poisoned children are racial minorities and 90% live in homes subsidized by public assistance. The City’s childhood poverty rate has dramatically increased from 37.5% in 2000 to 46.5% in 2009 and is among highest in New York State. The City of Rochester has some of the oldest housing stock in poorest condition in New York State according to the University of Rochester’s Environmental Health Sciences Center. According to the Center for Governmental Research, the neighborhoods in the large “crescent” that surrounds the Central Business District and includes three of the City’s four Quadrants ... *“display the characteristics associated with elevated blood lead levels, including: concentration of minority residents, high percentage of families in poverty, a large proportion of the population that does not receive a high school diploma, low housing values, low owner occupancy rates and high population densities.”* While these risk factors are increasing those living in the City of Rochester with no health insurance coverage also increased 21% from 10.6% to 12.8 % from 2008 to 2009. Similarly reflecting trends in poverty and in those at risk for basic necessities, Foodlink, Rochester’s nonprofit foodbank, is distributing 35 percent more food than just 2 years ago.

## 1.b. Financial Need

### 1.b.i) Describe the economic impact of brownfields on the targeted community...

While the City of Rochester has an active and successful brownfield program the pace of municipal and private sector brownfield cleanup and redevelopment in the City is about 10-20 acres per year and has slowed as a result of the recent recession. Despite almost 20 years of brownfield cleanup and redevelopment in Rochester, there are over three thousand acres of brownfield properties that still require assessment and possibly cleanup. The number of vacant properties in Rochester has risen approximately 50% in the just the last five years. City real estate data indicates that brownfields and vacant properties both depress neighboring property values and choke-off investment. This contributes directly to a lack of jobs and employments opportunities for residents in the affected neighborhoods.

### City of Rochester Key Demographic Statistics

Category	City of Rochester	New York State	US - National
Unemployment Rate	11.7%	8.3%	9.6%
Median Household Income	\$30,553	\$54,659	\$52,175
Minority Population	50%	31%	23%
Children under 18 living below the poverty level	46.5%	20%	18.2%

Sources: US Census Bureau American Community Survey (2006-2008) and (2009)  
US Department of Labor, Bureau of Labor Statistics (August 2010)

*The City's published Fiscal Year 2011 City Budget projects a total budget gap for Fiscal Year 2012 of \$51.2 million (10.7%). This projected gap increases to \$152.8 million by fiscal year 2015-16 when it represents over 28% of the total inflation adjusted City budget. Rochester lost 11.9% of its population between 1990 and 2009 (1990 and estimated 2009 Census data) which when combined with the dramatic increase in abandoned properties and manufacturing losses, has depressed property valuations and the property tax base. These trends significantly limit Rochester's ability to utilize other local sources of funding to address brownfield assessment. In addition New York State's municipal brownfield grant program, the Environmental Restoration Program (ERP), which Rochester had used very successfully for 10 years, is currently unfunded and no longer available. NYS ERP grants, totalling \$10 million, have represented approximately 40% of the City's brownfield capital funding for cleanup projects over the last ten years. Within New York State there are now very limited funding resources available to the public or private sectors for initial brownfield assessments and due diligence. These resource limitations severely constrain the City's ability to finance brownfield assessment and redevelopment.*

*This year one in ten properties are property tax delinquent in the City of Rochester. Based on the number of pre-foreclosure environmental reviews performed by the City from 1995 to 2010, there has been an increase of 50% in the number of tax delinquent commercial and industrial properties reflecting a rising number of brownfields in the community. The majority of Rochester's brownfield sites are not owned by the City and are located in neighborhoods where property values have experienced several consecutive years of decline. The City of Rochester has experienced a general, long-term twenty year decline in real assessed property values in many neighborhoods. Rochester has experienced massive job losses in its traditional industrial jobs and continues to experience facility closings at some of its major employers such as Eastman Kodak, Delphi, and Valeo. Employment by Kodak in Rochester has dropped from about 65,000 in 1980 to under 7,000 in 2010. These trends continue to add to the number of vacant and abandoned brownfield properties in Rochester which directly contributes to the decline of many City neighborhoods. Since 2000, the total number of vacant properties in Rochester has increased by over 50% to 3,000.*

The City's proposed **Community Brownfield Assistance Program (CBAP)**, is based on its existing fee for service brownfield assistance program which provides assessment services to encourage business and developer investment in urban brownfield properties. The City's prior EPA brownfield assessment grant that has been used to fund the existing brownfield assistance program was fully committed to approved sites in January 2010. *The proposed CBAP will be one of the very few means that the City of Rochester has to level the playing field with nearby greenfield development sites, encourage private sector brownfield cleanup and redevelopment, and facilitate the City's ambitious greening and right-sizing plan, "Project Green".* Given the City of Rochester's severely constrained fiscal condition, private sector investment and proactive community-based right-sizing have become the key elements necessary to promote cleanup and redevelopment. With the proposed grant funding Rochester's CBAP will continue to provide a vital financial tool to encourage brownfield reuse and redevelopment by mitigating the out-of-pocket costs that businesses, developers and community groups would typically pay to conduct site assessments.

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## **2. Project Description and Feasibility of Success**

### **2.a. Project Description**

#### **2.a.i) Describe the project you are proposing to be funded under this grant.**

Rochester's proposed grant project, the CBAP, is a continuation and major expansion of the City's successful brownfield assistance program (BAP). This fee-for-service program has for the past nine years been providing site assessment services to businesses and developers, including non-profit housing developers, interested in redeveloping brownfield properties in Rochester. Applicants are required to apply to the program and meet City economic development or housing objectives, if approved by the City's Neighborhood and Business Development (NBD) Department, select one of several environmental consultants under contract with the City to perform site assessment services. The City's brownfield coordinator reviews and approves the consultant's proposed scope of services and project budgets after EPA Region 2 approves the sites. The assessment activities are financed using EPA brownfield community assessment grant funding. Applicants repay one third of the assessment costs to the City if they proceed with the acquisition and redevelopment of the site. The City uses this program income to fund additional assessments.

*Under the proposed grant the City will expand the program to allow Community-Based Organizations (CBO's) to apply for environmental site assessment services for properties of interest or concern to the neighborhoods.* Businesses and developers will also continue to be eligible to apply to the program. Under the new Community Brownfield Assistance Program, neighborhood and community groups from the City's four planning Quadrants, will apply to the City's NBD Quadrant Administrators for brownfield assessments of sites of importance to the neighborhoods. The Administrators will then evaluate site access and quadrant priorities as part of the site selection and approval process. The CBO's therefore become Applicants to the Community Brownfield Assistance Program. Unlike business and developer applicants, CBO's will not be required to pay a service fee to the City. Information on each proposed site will be submitted to EPA Region 2 for approval prior to the performance of any EPA brownfield grant funded assessment work.

An important new object of the Community Brownfield Assistance Program will be the empowerment of Rochester's community and neighborhood groups to actively collaborate with the City as it begins to implement "Project Green". Rochester's infrastructure and built environment supported a population of over 330,000 in the 1950's. The City's current excess of substandard and abandoned properties reflects a population reduction of over 100,000 from its peak in the 1950's to the current population of 207,000. Project Green is Rochester's city-wide green infrastructure initiative that will involve acquisition, assembly, and reuse of abandoned, vacant, and brownfield properties in ways that will improve the quality of life for its 207,000 current residents and by doing so make better use of scarce public resources. The goal is the establishment and funding of a multi-purpose land-bank program that strategically decommissions surplus public infrastructure, acquires abandoned properties, brownfields, and other seriously blighted sites. Management strategies include strategic residential inventory clearance, vacant land greening, community gardens, urban agriculture, and new and restorative green building improvements. *The overall goal of Project Green is to address 3,000 vacant and abandoned properties, and the Community Brownfield Assistance Program will be a key resource for Rochester as it tackles this challenge.* Project Green, as a result of the large number of properties to be

addressed, is dramatically increasing the demand for brownfield site assessment services. Over the next four years it presents an order of magnitude increase in the number of potential brownfield redevelopment sites planned by the City's NBD Department. The proposed CBAP will help the City address this anticipated demand for site assessment services. Rochester is requesting both petroleum and hazardous substance funding not only because of the large number of properties to be addressed but also because site inventory data indicate that approximately 50% of brownfields sites in Rochester are petroleum sites. Petroleum and hazardous substance sites will be tracked separately and decisions about the appropriate site category will be made through discussions with EPA Region 2.

*All parcels investigated under the CBAP will be entered into the City's environmental institutional control system, and, where appropriate, restrictions established on future uses and excavation, demolition, and building permitting.* Rochester's brownfield institutional control system, the **Building Permit Flagging System (BPFS)**, was established in 1996. The BPFS is based on electronic flagging of parcels on the City's computerized building permit system. Approximately 130 parcels are currently included in the BPFS. The BPFS was established to protect future users, adjoining neighborhood residents, construction workers, and maintenance personnel from residual contamination and to protect brownfield site remedies and engineering controls at brownfield sites managed and remediated by the City of Rochester. Under the proposed grant the City proposes to add 50 CBAP sites into the BPFS in order to ensure that future uses are consistent with site conditions and cleanup requirements. The proposed EPA assessment project will provide funding support for the City to set up and track CBAP site parcel flags on the City's permit system, review permit applications, and when needed make referrals to the Monroe County Health Department and NYSDEC. The City will also track its IC costs for CBAP sites.

## 2.b. Budget for EPA Funding and Leveraging Other Resources

### 2.b.i) Use the table format below to identify specific tasks ...

(Both hazardous substance sites and sites with petroleum contamination)

	Task 1 Community Brownfield Assistance Program		Task 2 Institutional Control Program		Task 3 Community Meetings & Education		Budget Category
Budget Categories	Haz Sub	Petrol	Haz Sub	Petrol	Haz Sub	Petrol	Total
Personnel	\$3,450	\$3,450	\$1,725	\$1,725	\$2,500	\$2,500	\$15,350
Fringe	\$1,550	\$1,550	\$875	\$875	\$1,125	\$1,125	\$7,100
Travel	\$1,500	\$1,500	\$375	\$375	\$100	\$100	\$3,950
Equipment							\$0
Supplies			\$100	\$100	\$200	\$200	\$600
Contractual	\$186,500	\$186,500		\$0			\$373,000
Other							\$0
<b>Total</b>	<b>\$193,000</b>	<b>\$193,000</b>	<b>\$3,075</b>	<b>\$3,075</b>	<b>\$3,925</b>	<b>\$3,925</b>	<b>\$400,000</b>

*All procurement will comply with procedures in 40CFR 31.36.*

### Program Description and Budget Task Narrative:

Task 1 - Task 1 is primarily contractual consulting costs for site assessment services. CBAP applicants apply to the City for site assessment consulting services, which account for over 93% of the proposed budget. Consultants will perform approximately 50 BAP phase 1 site assessments (25 petroleum and 25 hazardous substance sites) at an average cost of \$2,500 each, for total costs of \$62,500 and \$62,500 respectively. An additional 20 phase 2 site investigation projects

(10 petroleum and 10 haz. substance sites) at an average cost of \$12,400 are expected to be completed at a total cost of \$124,000 and \$124,000 respectively. Phase 2 investigations will be conducted under the relevant NYS environmental remediation program as appropriate. It is also expected that the Phase 2 services may include preliminary remedial cost estimating and conceptual redevelopment planning depending on the applicant needs. As previously mentioned, based on the City's current inventory of brownfields it is anticipated that approximately one half of CBAP projects will be petroleum sites with the balance of sites impacted predominately by hazardous substance.

Task 1 also includes City staff implementation and programmatic activities including the procurement of consultant services, review of CBAP applications, submission of site approval letters to EPA, technical review of consultant scope of services and proposed fees, review of assessment reporting, meetings with applicants and consultants, monthly internal coordination meetings, project tracking, program performance reviews, and progress reporting to EPA. The City will maintain a database of all CBAP projects and assessment reports. Proposed grant funding will fund 96 hours of staff time at an average labor rate (inclusive of fringe benefits) of \$52/hour (\$5,000 for petroleum parcels and \$5,000 for haz. substance parcels). Travel and mileage for quarterly USEPA NYS roundtable meetings in Albany, NY and attendance at the USEPA National Brownfield Conference are funded at \$1,500 under petroleum sites and \$1,500 under haz. substances sites.

Task 2 - This Task includes staff program management, travel, and supply costs associated with entering, tracking, monitoring, and enforcing CBAP sites in the City's permit based environmental institutional control program. The City's institutional control program, the Building Permit Flagging System (BPFS), will track the properties associated with the estimated 50 hazardous substance and petroleum sites assessed through the CBAP. Grant funded activities are for City DEQ staff to establish new electronic permit flags for added CBAP parcels, performing reviews of permit applications for flagged parcels including referral's to the NYSDEC, and site inspections. A geographic information systems layer of flagged parcels will also be established and made available to Community Based Organizations and the public through the City's web page. Proposed grant funding will fund 100 total grant hours of staff time at an average labor rate (inclusive of fringe benefits) of \$52/hour (\$2,600 for petroleum parcels and \$2,600 for haz. substance parcels). Mileage (1,500 miles @ \$0.50 per mile) for meetings with permit applicants and NYSDEC ( 2 trips to Albany & 8 trips to the Avon Offices) totals \$375 for petroleum and \$375 for haz substances sites, and supplies for copying and distributing permit application and site management plans (\$100 for petroleum and \$100 for haz. substance sites).

Task 3 - Preparation and participation by City CBAP staff and Quadrant Administrators at 12 Quarterly Quadrant CBO coordination meetings to train neighborhood and CBO leaders about the CBAP and Project Green and to provide updates on progress and share project results. Proposed grant funding will fund 120 hours of staff time at an average labor rate (inclusive of fringe benefits) of \$60.4/hour (\$3,625 for petroleum parcels and \$3,625 for haz. substance parcels). Mileage (800 miles @ \$0.50 per mile) for 12 quarterly Quadrant meetings and 12 project review meetings with CBO applicants, \$200 for petroleum sites and \$200 for haz



substances sites, and supplies for preparation and production of updated CBAP and BPFS program brochures and educational materials, electronic and hard copies of assessment reports, and meeting displays (\$200 for petroleum and \$200 for haz. substance sites).

**2.b.ii) Leveraging. If assessments determine that additional work (e.g., assessment...**

One of the advantages of the CBAP approach is that it will leverage outside funding for every project that moves beyond due diligence assessment activities. Over the past ten years 55% of program applicants proceeded with cleanup and redevelopment after assessments were completed. Those CBAP redevelopment projects that are undertaken by businesses and developers and that continue beyond the site assessments phase will result in additional private investment in cleanup and redevelopment activities. Non-CBO applicants will be required to pay a service fee to pay the City if they proceed with the redevelopment project. The service fee is equivalent to one third of the City's costs for a CBAP consultant to perform the assessment phase work. More significant, however, is that business and developer applicants nearly always finance other CBAP ineligible costs such as asbestos abatement and cleanup phase work along with redevelopment costs. Total leveraged investment in cleanup and redevelopment at prior BAP sites to date has exceeded \$38.5 million.

Rochester annually allocates \$250,000 of its federal CDBG allocation to fund a Predevelopment Grant Program (PDP). The PDP provides dollar for dollar matching grant funds to businesses conducting environmental and engineering activities needed for development on property the businesses have already acquired. The PDP compliments the CBAP and leverages up to \$250,000 annually in matching private sector funding. Rochester also provides a variety of loans and grants to businesses and developers for redevelopment phase costs, including cleanup, through the City's HUD funded programs (CDBG, 108 loans, HOME grants and loans, etc.) as well as the Rochester Economic Development Corporation. Of particular importance to the assessment of properties identified by CBO's is the availability of the City's site clearance and demolition funding program. Approximately \$3 million in local, state, and federal funding has been set aside to manage asbestos abatement, demolition, cleanup and site preparation costs for Project Green related activities. The City also has an industrial and hazardous waste management capital fund allocation. The City uses this \$100,000 fund to perform hazardous materials and waste removal actions at vacant and abandoned properties. Rochester also works closely with the NYSDEC which performs removal actions or makes referrals to the USEPA for such work.

The City strategically attempts to secure funding from responsible parties such as CSX Transportation, Exxon Mobil, and Atlantic Richfield. Funds collected from responsible parties have exceeded \$500,000 and are being used for brownfield site assessment and remedial activities by the City's Division of Environmental Quality. The City currently is also conducting NYS Department of State grant funded Brownfield Opportunity Area (BOA) planning projects and has completed initial plans for several locations in the City which total over 400 acres. BOA projects are area-wide community-based land use planning efforts in areas with high concentrations of brownfield properties. Once final BOA land use plans are complete the City becomes eligible for and will apply for BOA site assessment grant funding.

Although funded from an EPA grant, and therefore not technically a leverage source, the City of Rochester has also established a \$500,000 EPA grant funded Brownfield Revolving Loan Fund program. The first approved RLF loan application approved by the City resulted from a site assessment activities

previously completed under the City's EPA grant funded brownfield assistance program.

## **2.c. Programmatic Capability and Past Performance**

### **2.c.(i) Programmatic Capability**

#### **• Describe the management systems you will have in place to direct activities...**

The CBAP management structure and processes are established and, at a minimum, include application review, environmental assessment scope and budget review, EPA site approvals, notice to proceed, and an assessment project closure meeting with the applicant, CBAP, consultant, and City's brownfield coordinator. The City's brownfield coordinator is involved in each step. Primary responsibility for the review and approval of CBAP applications resides within the City's NBD Department. CBAP coordination meetings will continue to be held at least quarterly with NBD staff. With the expansion of the program to include CBO's under this proposed grant, the NBD Quadrant Administrators will review CBO applications and also be part of the quarterly coordination meetings. The DEQ grants coordinator tracks the status of each site. DEQ has well established procedures for consultant contracting, payment requests, and grants management including drawdown requests.

The BPFS is managed by the Division of Environmental Quality. Each parcel in the system is supported by IC/EC documentation, assessment reporting, and a site management plan. Permit application reviews between DEQ and City Permit and Zoning staff are carefully coordinated and documented. BPFS quality control checks are performed monthly.

#### **•Description of Project Manager and staff and a discussion of their expertise...**

The City DEQ has managed site investigation and cleanup projects for over 24 years and for over 15 years has been overseeing New York State and federal EPA brownfield grant funded projects, including the brownfield assistance program for the last 9 years. The City's brownfield coordinator has over 25 years experience and has managed the Division of Environmental Quality (DEQ) since 1994. The DEQ includes five full-time, degreed, environmental professionals and a full-time grants/budget coordinator. DEQ has managed several hundred environmental site assessment projects and several dozen cleanup projects covering nearly 400 acres. DEQ staff have managed \$10 million in NYS 1996 Bond Act Environmental Restoration Program grant funds for six brownfield sites in addition to two NYS grant funded Brownfield Opportunity Area (area-wide planning) grant projects. DEQ also managed an \$8 million cleanup of a 21-acre NYS Superfund site that was redeveloped into a \$26.4 million regional fire training facility. DEQ established the City's permit-based environmental institutional control system, BPFS, for City managed brownfield sites in 1996. The BPFS IC system currently tracks and manages 130 parcels in the City. Collectively DEQ staff members have over 80 years of experience in managing environmental assessment and cleanups for residential, commercial, industrial, recreational and open space brownfield redevelopment projects.

#### **•Discuss the means you will use to retain project leadership or recruit qualified staff...**

Succession planning and organizational changes to encourage retention of experienced staff began in 2007. In 2007 an expansion of City DEQ functional responsibilities led to the promotion of two senior environmental specialists and an increase in part-time staffing. The senior staff are both experienced with EPA brownfield grants and cooperative agreements. In addition, DEQ annually provides intensive co-op training for one or two senior level college environmental interns. In the event of turnover within DEQ, these interns can be hired into the City's entry level technician level positions and existing staff

promoted to fill vacancies. DEQ technical staff were encouraged to take civil service exams for every title within the division. As a result each DEQ brownfield staff person is now reachable on civil service lists for every staff level title within in the division so that promotions can be made quickly in the event of a vacancy.

**•Describe the system(s) you have in place to acquire additional expertise...**

In order to secure environmental assessment consulting services, a request for proposal (RFP) will be prepared by the City's brownfield coordinator based on the EPA approved work plan included in the executed EPA cooperative agreements. The City Division of Environmental Quality has an established system of soliciting professional consulting services. RFP drafts are reviewed and must be approved prior to advertisement by the Division Manager, who serves as the Grant Project Director. Proposals received by the City are carefully reviewed, rated using quantitative ranking criteria, and ranked. Proposed costs and pricing are carefully analyzed and compared. Depending on the nature of the project, interviews are held prior to selection. Once consultants are selected for the CBAP a recommendation is made and City Council authorization is required prior to executing professional service agreements with the consultants. DEQ has 24 years experience hiring environmental consultants for investigation, compliance, and cleanup professional services and is experienced in procuring professional environmental consulting services under EPA's brownfield cooperative agreement procurement requirements. Rochester will comply with competitive procurement standards in 40 CFR Part 31.36 and all contractor and subaward/subgrant requirements.

**ii) Past Performance**

**Item 1. Currently or has ever received an EPA Brownfield Grant...**

**• Identify the EPA Brownfields grant(s) you currently have or have received...**

Rochester's most recent EPA brownfield grants have included:

- 1) a \$200,000 community-wide assessment grant to assess sites within the City's NYS Brownfield Opportunity Areas to facilitate and accelerate area-wide planning;
- 2) a \$200,000 hazardous substance cleanup grant project for the 399 Gregory Street site which was assessed using EPA grant funds. Rochester completed the cleanup in 2009 under the NYS Brownfield Cleanup Program and the EPA grant was closed in August 2010;
- 3) a \$200,000 community-wide assessment grant for Rochester's brownfield assistance program for which remaining grant funds were fully committed to new assessment projects in January 2010;
- 4) a \$200,000 petroleum cleanup grant for 935 W. Broad Street which was previously investigated using EPA assessment grant funding. This cleanup project was completed under the NYSDEC petroleum spill program and the grant was closed in 2009;
- 5) a \$280,000 assessment grant that financed Rochester's Brownfield Assistance Program, a petroleum assessment project at 935 W. Broad Street, and a hazardous substance assessment at 399 Gregory Street. Both site investigations were successfully completed under NYSDEC oversight and resulted in approved cleanup remedies. Several completed BAP projects resulted in successful redevelopment projects and the grant was closed in 2008.

**• Funds Expenditure: the balance of grant funds not drawn down...**

Of the \$1,080,000 in grant funding for the above referenced grants, \$110,884 (10.2%) has not yet been drawn down. The \$110,884.67 balance is fully committed to complete consulting and staff programmatic

work that has not yet been billed. Of the five grants listed three have already been closed out.

- **Compliance with grant requirements:**

Rochester has consistently met its work plan and cooperative agreement requirements. Rochester has met EPA requirements for procuring professional environmental services through well established advertising and request for proposal or public bidding procedures in accordance with NYS General Municipal Law. City DEQ project managers and consultants provide performance data and status information to the DEQ grants compliance coordinator. The grants compliance coordinator monitors financial, budget, environmental outputs and deliverables, and helps assemble output and outcome data for the City Project Director to evaluate. Variances from expected cooperative agreement work plan objectives have been investigated and reported to EPA Region 2 both informally and through required reporting. Site approval requests under community-wide assessment were submitted on a timely basis. Actual work plan outputs, schedules, and key results are compared against work plan estimates and reported on a timely basis. Quarterly progress reporting, reporting measures, and annual financial reports for the existing EPA assessment and cleanup grants are up to date and have been made in a timely manner. Annual financial reporting has been performed as required by the City's Accounting Bureau. The City's quarterly reporting routinely linked progress toward achieving grant output goals, for example, numbers of site assessments completed, to actual performance. Rochester has frequently communicated progress and accomplishments to both its EPA Region 2 project manager as well as through the EPA ACRES program. A brownfield assistance program evaluation report of outcomes was prepared and submitted as part of the closeout process. Each assistance program project is tracked and key milestone dates and accomplishments recorded. Several parameters are calculated including program demand, efficiency, costs and results are tracked and reported to EPA. Rochester's performance, including the completion of EPA funded cleanup projects and active, successful use of the brownfield assistance program by the private sector, demonstrates that it is achieving the results expected from its cooperative agreements.

- **Accomplishments:**

Rochester's performance demonstrates that it is achieving the results expected from its cooperative agreements with EPA and is a successful ambassador for EPA's brownfield program. Rochester has reported progress and successes directly its EPA Region 2 project manager, through quarterly reporting, and with its more recent grants, in ACRES. *Rochester has a demonstrated 9-year track record of success and accomplishments with its assistance program that significantly increase the likelihood that the CBAP will be successful.* Since EPA began awarding brownfield cleanup grants Rochester has successfully completed four EPA funded cleanup projects totaling six acres and the City DEQ is working with the City's NBD Department to prepare RFP's and review redevelopment proposals for three of these sites. The fourth will be a public park on the Genesee River which is integrated with a new private \$20 million private brownfield cleanup and waterfront housing redevelopment project. DEQ is also in the process of completing three additional EPA funded brownfield cleanup projects totaling 17 acres. Using EPA assessment grant funds Rochester completed a remedial investigation, remedy selection, and remedial work plans for a key City-owned site, the Erie Canal Industrial Park (ECIP). The City then performed a City-funded \$750,000 NYS voluntary cleanup of the site. The EPA assessment funded work set the stage for reuse of the ECIP site as the home for the Rochester Rhinos professional soccer team. The Rhinos opened the new 15,000 seat, \$27 million soccer stadium on the ECIP site in June 2006. Stadium funding included more than \$9 million in privately secured financing and more than \$15 million from the State of

New York. *Using its assessment grants, Rochester established the brownfield assistance program which has resulted in the investigation of over 66 acres of brownfields at 32 sites by the businesses and developers. Over \$38.5 million dollars in redevelopment investment has occurred at BAP project sites with an additional \$3.7 million in additional investment expected from current BAP projects. Prior BAP expansion and redevelopment projects have retained 1,083 jobs and resulted in the creation of 382 new jobs in the City of Rochester.* The City was awarded the 2006 Local Government Innovation Award from the New York State Conference of Mayors and was recognized by the National League of Cities for the brownfield assistance program. The City has received national attention for its BPFS from ICMA.

- **Describe any adverse audit findings...** Rochester has an established grant monitoring and audit process and has not received any adverse audit findings.

**2.c.ii) Has Not Received an EAP ...** The section is not applicable to the City of Rochester, New York

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### **3. Community Engagement and Partnerships**

#### **3.a. Discuss your plan for involving the affected community...**

The City's Brownfield Program Coordinator initiated discussions with stakeholders by presenting the proposed expansion of the existing assistance program to include community based organizations at meetings with the City's Planning Director, Quadrant Administrators, and meetings with neighborhood and community based organizations (CBO's). These meetings, included participation in Project Green – Urban Agriculture Policy meetings with neighborhood and community stakeholders, were held during July, August and September 2010. *The role of CBO's in "Project Green" and the need for community-based "land banking" strategies made clear the need for an approach that focuses significant new brownfield assessment resources to sites of concern to CBO's and those living in City neighborhoods.* After discussing the CBAP concept with several neighborhood group leaders, the City's Brownfield Coordinator presented the plan to submit a proposal for EPA brownfield assessment funds to a joint meeting of CBO leaders from all four City Quadrants referred to as the Neighbors Building Neighborhood Alliance Meeting, on September 30, 2010.

The expansion of the CBAP to include CBO's as applicants will require additional training sessions about brownfields, the CBAP, and the BPFS, and regular meetings with the Quadrant Administrators, CBO's and neighborhood leaders to prioritize sites, review progress on sites of concern, and discuss site assessment results. The City plans to convene 12 quarterly CBAP update meetings for participating CBO's and neighborhoods. City Quadrant Administrators will work directly with CBO's and residents to review applications, establish site access, and prioritize proposed CBAP sites. The CBO's applicants will also be provided technical assistance and support from City brownfield staff regarding strategies for sites in the same manner that these services have previously been provided to businesses and developers. Rochester has allocated a portion of the proposed project assessment grant budget to public outreach and training about the CBAP and BPFS. Also under this grant, the City DEQ will identify CBAP project sites and BPFS parcels on the City's web site. Web-based and hard copies of both the CBAP and the BPFS brochures will be shared with CBOs and neighborhood representatives. In addition, Spanish versions of the program brochures will also be prepared and distributed where CBO's and Quadrant Administrators think it would be beneficial.

The City will also continue to perform direct outreach regarding the CBAP to private businesses and commercial developers, profit and not for profit housing developers, consultants, lenders, real estate professionals and attorneys – the original target stakeholders for the assistance program. Outreach and involvement efforts have and will continue to include training sessions by City staff about the program, web-based information about CBAP application and process and the BPFS requirements and affected properties, and the distribution of program brochures. Individual meetings with program applicants and CBAP consultants will also be held and often provided the best mechanism to work through questions and concerns as well as progress reporting. Each applicant approved to the CBAP becomes a partner with the City to responsibly assess, cleanup and reuse brownfields. Redevelopment concepts, including Project Green strategies, will be discussed with the neighborhoods and revised with community input. As projects continue beyond the completion of assessments, cleanup and reuse coordination meetings are held with affected City, Monroe County and State agencies, public utilities, and neighborhood leaders.

The City will be coordinating the CBAP community involvement plans with its NYS grant funded brownfield area-wide planning projects, referred to as Brownfield Opportunity Areas (BOA's). The BOA projects include efforts to train and hire neighborhood residents to assist the City and its consultants with the development of BOA studies and land use plans, in addition to assisting with the identification of strategic brownfields for the CBAP. Through the proposed EPA grant the City will link environmental assessments with BOA supported employment of neighborhood residents in area wide brownfield planning and research. The City will also encourage neighborhood-based consultants and subconsultants to submit proposals when it procures CBAP site assessment services.

### **3.b. Describe your efforts and/or plans to develop partnerships with your local...**

For twenty five years the City has participated on the Monroe County Health Department Waste Site Advisory Committee, which was established by a memorandum of agreement between the Monroe County Department of Health (MCDOH) and the NYSDEC regarding waste site information and decision making. Every other month the City actively participates in the Waste Site Advisory Committee.

At these meetings the status of all brownfield projects in the county are discussed. These discussions will include CBAP sites. State and Monroe County health and environmental agencies are involved in all City brownfield projects. Rochester directly involves the health departments in site reuse planning decisions and will encourage all CBAP applicants to approach the MCDOH in the early planning phases of brownfield redevelopment projects in order to ensure that health issues are addressed. On all City brownfield projects the NYSDEC routinely makes referrals to and consults with the State and Monroe County Departments of Health on investigations, remedy selection, cleanups, work planning, and reporting. When CBAP applicants complete projects under the NYS Brownfield Cleanup Program, annual certification requirements are established with regard to any engineering control systems and site monitoring requirements. The City has substantial experience in all of the NYSDEC remedial programs, and there is a close working relationship between the involved agencies with most personnel having worked together on projects for more than 10 years. Since 1995 Rochester's environmental institutional control system, the BPFS, has involved referrals to NYSDEC and Monroe County Department of Health (MCDOH) when the City receives various building and construction permits applications for City managed cleanup sites where use limitations, monitoring requirements and engineering controls are in place.

The City plans to add all the parcels that are assessed using the proposed grant to the BPFS to guide and control future uses and permitting. The BPFS is based on established relationships with MCDOH and NYSDEC. BPFS guidance documents are prepared with the involvement of the NYSDEC and MCDOH to assure consistency in future relationships with permit applicants. When the City receives new permit or land use change applications City DEQ staff refer the applications to NYSDEC and MCDOH for comment and approval prior to the City issuing permit approvals. Under the proposed grant the City will add the BPFS to the City web-site for access by MCDOH, NYSDEC, and other local governmental agencies such as the State and County transportation and economic development agencies that become involved in the review brownfield redevelopment projects.

### **3.c. Provide a description of, and role of, the key community-based organizations ...**

*Seven key CBO's, representing the areas of the City most impacted by brownfield sites and where designated brownfield opportunity areas are located, have already agreed to partner with the City in the CBAP.* An additional 5-6 CBO's have expressed interest in participating. The role of each of these organizations will be the same: to identify vacant, abandoned, brownfield sites and then make applications to the appropriate City Quadrant Administrator for CBAP site assessments services. Several of the CBO's have already identified sites of interest or concern. The CBAP will become an implementation tool for the CBO's to advance community-based reuse plans that take into account neighborhood concepts of potential site reuses. In some cases the participating CBO's will be helping the City advance Project Green and strategic land banking for green infrastructure projects. In other instances CBO's will identify brownfield sites of interest for opportunities for investment and job creation through future commercial, industrial, and residential redevelopment. The City is hopeful that successful site assessment, cleanup and reuse of sites identified by the seven initial key CBO partners will help convince other neighborhood and community groups to participate.

<b>Community Based Organization</b>	<b>Purpose/Description</b>	<b>Contact Person</b>
Group 14621	Civic engagement to improve the general quality of life in the 14621 zip code area. (Directly managing a NYS grant funded BOA area-wide planning project)	Eugenio Cotto, Jr. Executive Director
Marketview Heights Association	Improving the quality of life in northeast Rochester	Francisco Rivera Executive Director
Charlotte Community Association	Promote the safety, general welfare and betterment of the Charlotte Community	Brian Labigan President
Lyell/Jay Area Merchants Association.	Improving both the economic climate and surrounding community in the area of Lyell Avenue and Jay Street. (Located in a City BOA area-wide planning project)	Tim McGrath President
Southwest Common Council	Volunteer community board for six southwest neighborhoods with the purpose of making sure that the neighborhoods' voices are heard (Located in a City BOA area-wide planning project)	John Borek and Paul Jones, Co-Chairs

Sector 4 Community Development Corporation	Build partnerships and collaborations between business, neighborhood, community organizations to renew, redevelop and rebuild (Located in a City BOA area-wide planning project)	Joan Roby Davison Director
Park Avenue Landlord Association	Advocacy for rehabilitation and redevelopment projects in the SE Quadrant	Joeseeph Hanna President

Each of the CBO's roles will be to identify key brownfield properties of concern and interest within the City's quadrants as an applicant to the CBAP. The CBO's will focus on problematic and strategic tax delinquent, vacant or underutilized brownfield properties, including those sites that have and will be identified through the City's Brownfield Opportunity Area planning projects. Project sites that would be particularly strategic to Project Green including potential community gardens, urban agriculture sites, rain gardens, storm water management areas, and green space will be encouraged. The CBO's will then work with the appropriate City Quadrant Administrator to prioritize the properties for subsequent investigation through the City's CBAP. Once the Quadrant Administrator approves a property or site into the CBAP, the CBO applicant will work with one of the City's CBAP consultants to develop an appropriate investigation scope and project budget. The City's Brownfield Coordinator will submit site information to EPA Region 2 for approval prior to initiation of work. The City expects that in some cases CBO's may be able to assist the CBAP consultants by providing property history, use information and possibly owner/operator information. When investigation results, including Phase 1 and Phase 2 assessment reports are completed, the City's Brownfield Coordinator, the Quadrant Administrators, and the CBO's will meet and discuss the results with the CBAP consultant in order to develop appropriate plans for cleanup if needed, site preparation, and interim and long term reuses.

#### **4. Project Benefits**

##### **4.a. Welfare and/or Public Health**

Redevelopment of sites accessed under the proposed grant will provide a number of direct environmental, social, and public health benefits to the neighborhoods and the City of Rochester. A primary benefit of the redevelopment of CBAP sites is that if soil, groundwater, surface water, vapor intrusion or other environmental contaminants are identified, such sites will begin the process of undergoing remedial investigation, remedy selection and cleanup to mitigate environmental and public health risks. This remains a fundamental goal of brownfield redevelopment. More broadly, brownfield redevelopment has been demonstrated to reduce crime and vandalism, reduce the potential for arson fires, discourage illegal waste dumping, eliminate and prevent future public and health safety hazards, and can dramatically change both neighborhood residents' and workers' quality of life and visitor perceptions about livability. It is estimated that 50 sites will be assessed through the proposed grant funded CBAP. Addressing 50 sites will have the potential to put in motion significant environmental, social and public health improvements for many City neighborhoods.

*CBO's working with the City to identify sites and also help implement Project Green in a manner sensitive to neighborhood concerns will improve the likelihood of successful green infrastructure reuses that will both eliminate blight and generate environmental, social and public health benefits.*



The overall goal of Project Green is to address 3,000 vacant and abandoned properties. The vision of Project Green is to promote sustainable change and reuse. These efforts include the removal of vacant and irreparable residential structures that degrade neighborhoods and lower property values; vacant land greening for better storm water management; wildlife and habitat restoration; and community gardens and urban agriculture in inner city neighborhoods where fresh produce is not generally available. Project Green calls for LEED and restorative green building improvements to structures that remain on targeted parcels.

Based on the past success of the Rochester's brownfield assistance program, the CBAP will also be a particularly helpful financial incentive for smaller and medium-sized businesses that are often located in poorer neighborhoods and will positively influence business decisions to proceed with neighborhood redevelopment or expansion projects. Site investigations can help transform entire neighborhoods. Redevelopment by neighborhood and local businesses of sites assessed through the proposed grant will result in community and social benefits from reuse of brownfield properties that are compelling. The catalytic effects that cleanup and redevelopment of brownfield properties has made to the social fabric and quality of life in challenged Rochester neighborhoods is often remarkable. Privately funded redevelopment of BAP sites often results in significant improvements to the appearance of neighborhoods through the restoration of existing structures or construction of new facilities. One prior assistance program project resulted in essential financing required to ensure that the Cinema Theater, established in 1914 and one of the oldest continually operated movie theaters in the country, could make improvements and stay open to serve the community.

*Nearby and sensitive populations will be protected from contaminants during CBAP assessment work through the development and implementation of health department approved site specific investigation work plans and health and safety plans.* During field work these plans will be adhered to in order to protect adjacent property owners, tenants, residents, children, and elderly. Since many sites assessed under the CBAP are privately owned, employees and customers are also a potential receptor population that will be protected by conducting work in accordance with approved work plans and health and safety plans. The financial support of the CBAP actually makes it easier for applicants to afford to have consultants perform more rigorous health and safety programs and to more carefully implement field work. This is because the City pays CBAP consultants for the site assessment services using grant funds and the applicant is obligated to repay just 1/3 of the costs and only if it proceeds with the acquisition or redevelopment project.

After initial site assessment is completed the CBAP will likely be used to prepare site environmental management plans (EMPs) for future development activities. Implementation of EMP's ensures that excavation activities are performed correctly and that contaminants, waste materials are handled and disposed of properly, and air emissions are measured and controlled. A primary benefit of the CBAP is it will provide a mechanism for the completion of environmental assessment of sites that are of concern or interest to the City's neighborhoods as well as to those private properties of interest to businesses and developers that would otherwise be inaccessible to the City. If a CBAP site assessment identifies a significant environmental concern, such as a cache of drums, the City's brownfield coordinator now has authority established in Rochester City Code Chapter 59 to declare a property an immediate environmental hazard and legally enter the property for the purpose of addressing the hazard. Lastly the inclusion of CBAP sites in the City's BPFS will help ensure that environmental and public

health and welfare considerations are part of the redevelopment process by ensuring that any City building permits or land use approvals issued will be consistent with the site environmental conditions and cleanup requirements. The proposed grant will therefore provide benefits at the time of redevelopment by protecting future users, occupants, neighbors, and other sensitive populations and potential receptors from future excavation, construction, and development that is inconsistent with prior levels of cleanup and remaining subsurface contamination conditions.

#### **4.b. Economic Benefit and/or Greenspace**

##### **4.b.i) Economic Benefits, such as increased employment and expanded tax base,**

The past performance of the brownfield assistance program (BAP) provides a good indicator of results that can be expected from proposed EPA assessment grant funded CBAP. During the 9-year period of BAP program operation a total of 49 assessment phase projects were completed at 32 sites totaling 66 acres. To date, the total billed BAP grant costs for consultants, City program oversight, and expenses is less than \$400,000. This modest investment has leveraged substantial economic benefits: *Over \$38.5 million dollars in redevelopment investment occurred at BAP project sites. BAP site expansion and redevelopment projects have retained 1,083 jobs and resulted in the creation of 382 new jobs in the City of Rochester.* An additional \$3.7 million in additional investment and several dozen additional new jobs are expected from BAP projects sites where redevelopment is planned in the next year. Fifty five percent of the BAP projects have proceeded with the acquisition of brownfield properties and have completed or are undertaking cleanup and redevelopment projects.

In the last 9 years the BAP has helped stimulate over \$30 million in assessed property value increases helping to generate much needed new property tax revenue. BAP redevelopment projects have ranged from the construction of a new 133,000 square foot manufacturing building on a 13.4 acre former landfill site to the cleanup and reuse of a small .25 acre site for expanded parking for a small growing neighborhood business. BAP projects help contribute to increases in the property values of surrounding properties as well, which in turn leads to stability in neighborhoods and additional increased property tax revenues. Rochester's experience has been that EPA brownfield assessment funding creates increased community interest, support and positive attention for the affected sites and the neighborhoods around sites. In several instances the positive attention has attracted investor and developer interest in the area.

It is also noteworthy that the BPFS, although a City permit control mechanism, has been reported by some applicants to be considered a service that helped their redevelopment projects and provided economic benefit. In two instances, the assurance that City permits issued under the BPFS would ensure that site environmental conditions would be appropriately managed and inspected during construction was instrumental in the decisions by the lenders to make loans to the businesses redeveloping the flagged parcels.

##### **4.b.ii) Other non-economic benefits associated with sites to be reused for...**

By working with City CBO's and using the CBAP to help implement Project Green, the City expects important new benefits from EPA brownfield grant funding. In addition to the residential, commercial and industrial redevelopment objectives previously encouraged by the City's brownfield assistance program, the new CBAP will promote a new range of site reuses that will provide many quality of life benefits. As previously mentioned Project Green will promote the removal of vacant and irreparable

residential structures that degrade neighborhoods and lower property values, vacant land greening for better storm water management, wildlife and habitat restoration, community gardens and urban agriculture where fresh produce is not generally available. Project Green also contemplates a green network linking City neighborhoods to the City's formal parks, growing pedestrian & bicycle trail system, and waterfronts. It is estimated that 50% of the sites assessed under the proposed grant will become part of a green infrastructure of multifunctional open spaces, including gardens, woodlands, green corridors, wetlands, and meadows in areas of the City where these features have been lacking for decades. Although these benefits may be considered non-economic, research is increasingly showing that these types of amenities in urban areas revive nearby property values and create a new sense of "Place" for residents and visitors.

Not-for-profit applicants planning affordable housing projects have been and will continue to be encouraged to use the CBAP. Non-profit and affordable housing projects create new opportunities for mixture of uses such retail, office, and other complementary elements that serve the residents, adjacent neighborhood, and the community at large. Non-profit housing projects in Rochester also frequently include features such as pocket parks, green walkways, and landscaped areas.

#### **4. c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

A fundamental objective of Rochester's assistance program that will be continued in the CBAP is the creation of a financial incentive for private businesses and developers to consider previously developed property in the urban core of the City, rather than selecting a greenfield property in nearby suburban and rural areas. The CBAP directs redevelopment of brownfield properties to City of Rochester, the developed urban center of the five county metro-region, where infrastructure already exists and where the reuse of brownfields and underutilized infrastructure go hand in hand. The grant therefore will encourage redevelopment that will take advantage of the existing infrastructure including comprehensive public utilities (water, sewer, natural gas, electric, phone, cable, etc.) streets and curbing, sidewalks, metro bus service, nearby restaurants, retail services, existing parks and playgrounds, and other nearby health care and educational institutions. Since the CBAP is targeted to brownfields in the City it promotes the reuse of existing infrastructure, reduces transportation related pollution and energy consumption because it encourages redevelopment in the population center of the Rochester region.

The EPA has identified the need to reduce transportation related air pollution in Rochester. Mobile sources were identified through EPA's 2004 Community Initiative for Rochester as contributing 56% of air toxins in the area. The CBAP has a successful track record of stimulating redevelopment of City brownfields, and in doing so, contributes to pollution prevention, reduced energy and fuel consumption, and since bus service is concentrated in the City, promotes public transportation use.

Project Green will change the look and feel of Rochester by replacing vacant properties with vast swaths of sustainable green space. The plan recognizes that Rochester's built environment – buildings, streets and public utilities – no longer match the City's population trends. The long-term goal of Project Green is to address 3,000 vacant and abandoned properties. *Over the next five years, under Project Green the City plans to assess and acquire more than three dozen city blocks and 110 acres, which will be converted into a "green infrastructure" of open space that can be used for such purposes as community gardens, urban farms, parks, and renewable-energy generating facilities. New and existing green spaces will be connected by "green corridors" - a network of pedestrian and bicycle-friendly trails.* Other elements

of Project Green include the installation of roof-top gardens, historic preservation, focused investment and strategic development of the city's downtown and waterways. Additional potential site reuses include the conversion of vacant land to rain gardens to minimize stormwater impacts, the creation of new wildlife habitat, and the establishment of community gardens and urban agriculture in areas of the inner City where fresh produce is not generally available. Where existing structures are not removed Project Green also calls for green building renovation and repair as well as LEED certification for new construction. The expected environmental, social and public health benefits are associated with both the creation of new green infrastructure and the elimination of blight.

Rochester is using a \$500,000 allocation from its 2009 ARRA USDOE Energy Block grant to establish a Green Business Assistance Program. The City's oversight and management of the Energy Block grant is located within the Division of Environmental Quality which also manages the City's brownfield projects and programs. The Green Business Assistance program will offer grants to businesses that create green jobs and locate on brownfield properties and loans to businesses that purchase energy efficient HVAC and manufacturing equipment.

#### **4. d. Describe your plan for tracking and measuring your progress...**

Rochester's CBAP will track a number of key program efficiency indicators, environmental outputs, and economic and financial outcomes. This information will be reported by the DEQ grants coordinator as milestones are achieved and work completed through ACRES, and on a regular basis as required in quarterly progress reports to EPA Region 2. The City has and will continue to maintain a detailed database on CBAP sites. Data tracked for each site will include the number of applications received and approved, phase 1 and phase 2 site assessments completed, acres assessed, and environmental management plans and health and safety plans prepared and community training events and meetings. Using the same database, time frames for CBAP application reviews, consultant scope of work and budget reviews, EPA site approvals, consultant project proposal reviews, assessments, and reporting are also tracked to maintain and promote program efficiency and responsiveness.

Both Neighborhood and Business Development staff and DEQ will track CBAP project outcomes. Outcomes to be measured will include: private sector investment and other sources of leverage financial investment, job creation and retention, and service fee payments to the City, the number of sites and acres remediated, acquisition of vacant properties, demolition of structures, acres of green infrastructure established and property value changes near green infrastructure. Some of these outcomes, such as acres remediated, have been tracked since the mid 1990's as performance measures in the City's annual operating budget.

Performance outputs and outcomes are also measured for the City's BPFS. The City's BPFS monthly quality control reporting will continue to be used as during the proposed project with the NYSDEC. Existing quarterly performance measures such as the number of flagged parcels, permit applications for flagged parcels, referrals made to the NYSDEC, permits issued, and parcel tax account number changes will be reviewed.

**New York State Department of Environmental Conservation**  
**Division of Environmental Remediation**  
**Bureau of Program Management, 12th Floor**  
625 Broadway, Albany, New York 12233-7012  
**Phone:** (518) 402-9764 • **Fax:** (518) 402-9722  
**Website:** [www.dec.ny.gov](http://www.dec.ny.gov)



Alexander B. Grannis  
Commissioner

October 1, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
Department of Environmental Services  
City of Rochester  
30 Church Street, Room 300B  
Rochester, NY 14614

Dear Mr. Gregor:

This is to acknowledge that the New York State Department of Environmental Conservation (Department) received notice of your intent to submit a proposal for a United States Environmental Protection Agency (USEPA) brownfield assessment grant in the amount of \$400,000.

If awarded, I understand that the City intends to use the funds to support community-wide hazardous substance and petroleum assessment on sites submitted to the USEPA. Additionally, selection of sites for approval will be based on applications received by the City of Rochester. The Department's support is contingent upon the City coordinating the grant activities with their BOA grant activities and any other relevant State and Federal remedial activities being conducted in the area.

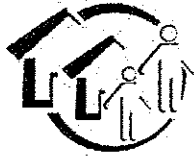
The Department encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose. I applaud the City's efforts to move this initiative forward.

Sincerely,

*Donna Weigel*

Donna Weigel  
Director  
Bureau of Program Management

cc: R. Torres, USEPA



## Group 14621 Community Association, Inc.

1171 North Clinton Avenue \* Rochester, NY 14621

Tel: 585-266-4693 \* Fax: 585-266-6196 \* Email: [group14621@group14621.com](mailto:group14621@group14621.com)

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##### Business

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Ernie Dankert (Alt.)

### Group 14621 Staff

#### Executive Director

Eugenio Cotto Jr.

#### Housing Program

##### Coordinator

Ricardo S. Nieves

#### Office Administrative

##### Assistant

Shirley M. Boone

##### Brownfield

#### Opportunity Area

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Hugh Vandegriff

##### Members

Bonnie Cannan

Tom Frey

Jane Forbes

Alan Oberst

#### Pulaski Committee

Patricia Cauty

Robert Djed Snead

September 24, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

Group 14621 Community Association, Inc. (G14621) appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in the 14621 Zip Code geographic neighborhood areas.

G14621 is a membership organization, since 1974 has been advocating to and for community residents to get involved in the civic engagement movement in collaborative efforts to improve the general quality of life encompassing education, employment, housing and recreation opportunities fostering personal responsibility, understanding and appreciating our diversity and similarities in the 14621 zip code area.

G14621 is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP, G14621 will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's Northeast Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. G14621 is particularly interested in having environmental assessments of properties of concern such as Old HiQual Site, Old Ridge Lumber Site and the outgoing Midland Site (that has been given a clean bill of health by EPA) in our neighborhood to develop in the future along with our efforts of the Group 14621 BOA awarded in 2009. We will assist the City's environmental consultants by providing property information and concerns through our BOA. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the



## Group 14621 Community Association, Inc.

1171 North Clinton Avenue \* Rochester, NY 14621

Tel: 585-266-4693 \* Fax: 585-266-6196 \* Email: [group14621@group14621.com](mailto:group14621@group14621.com)

*¡Se habla Español!*

results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform G14621 and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

Eugenio Cotto, Jr.  
Executive Director

EC/cbp



**Marketview Heights Association, Inc.**

308 North Street  
Rochester, NY 14605  
Tel: 585-423-1540 Fax: 585-423-1934  
email: mha@marketviewheights.org

September 23, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 US EPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

Marketview Heights Association appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in the Marketview Heights area neighborhood.

Marketview Heights Association is a not-for-profit multi-service organization committed to improving the quality of life within northeast Rochester. We are dedicated to promoting homeownership, improving housing conditions, increasing public safety, and strengthening our business corridors by working with our caring members and our resourceful partners.

Marketview Heights Association is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP Marketview Heights Association will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's NE Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. Marketview Heights Association is particularly interested in having environmental assessments of properties of concern in our neighborhood such as arson properties, properties that attach criminal activity, and sites suspected of posing health hazards to children. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.



We also understand that the City Division of Environmental Quality will inform Marketview Heights Association and the Quadrant Administrators whenever the US EPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the US EPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Francisco Rivera', followed by a horizontal line.

Francisco Rivera  
Executive Director

## **Charlotte Community Association**

www.charlottecca.com

October 4, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

The Charlotte Community Association appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in the Charlotte community in the NW quad.

The Charlotte Community Association is a nonprofit community based organization who's purpose is promote the safety, general welfare and betterment of the Charlotte community.

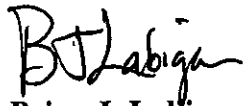
The Charlotte Community Association is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP, the Charlotte Community Association will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's NW Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. The Charlotte Community Association is particularly interested in having environmental assessments of properties of concern such as 4322 Lake Ave( The old U.S. Post Office, now vacant and for sale), 4653 Lake Ave( The old Fiddler's Green Bar,also vacant and for sale) and 240 Boxart St.( a vacant lot with semi-buried rusting drums noticed on site) in our neighborhood. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform The Charlotte Community Association and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Labigan". The signature is fluid and cursive, with a large initial "B" and a stylized "L".

**Brian J. Labigan,**  
President, Charlotte Community Association

# Lyell/Jay Area Merchants Assoc.



169 Saratoga Ave., Rochester NY 14608

October 6, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

The Lyell/Jay Area Merchants Assoc. appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in the Lyell Ave., Jay St. are of Northwest Rochester.

We are an organization of business owners with our businesses based in the area of Lyell Ave. and Jay St. As a non profit organization, dedicated to the improvement of both the economic climate and the surrounding community overall, we fully endorse and encourage this effort.

The Lyell/Jay Area Merchants Assoc. and its members are very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that are important to business and community groups in our area. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP, the Lyell/Jay Area Merchants, will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's NW Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. The Lyell/Jay Area Merchants Assoc. is particularly interested in having environmental assessments of properties of concern for the purpose of attracting investors to this area. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform Lyell/Jay Merchants and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Tim McGrath", with a stylized flourish at the end.

Tim McGrath  
President, Lyell/Jay Area Merchants Assoc.  
[Tmcgrath47@msn.com](mailto:Tmcgrath47@msn.com)  
585-721-8878  
Rochester, NY

October 12, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

The South West Common Council appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in South West Rochester, which is also referred to as The South West Quadrant.

The Council serves as a volunteer community board for six very distinct yet adjoining neighborhoods: the Nineteenth Ward, the South West Area Neighborhood, the Changing of the Scenes Neighborhood, Neighborhood United, the Plymouth Exchange Neighborhood and, most recently the Susan B. Anthony neighborhood. We represent through our members 40,000 Rochester residents. Our fiduciary relationship is with the South West Area Neighborhood Association. Our mission is to make sure that each of our neighborhood's voices is heard in government and the private sector in such diverse arenas as housing, public safety, transportations, parkland and economic development.


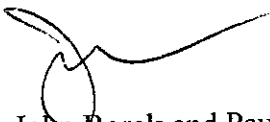
The South West Common Council is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP South West Common Council will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's SW Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. The South West Common Council is particularly interested in having environmental assessments of properties of concern such as the Vacuum Oil Site and the Genesee River frontage in our neighborhood. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform the SouthWest Common Council and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

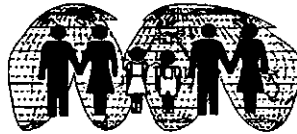
We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,



John Borek and Paul Jones, Co-Chairs, SouthWest Common Council

# ***Sector 4***



## ***Community Development Corporation***

October 13, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

The Sector 4 Community Development Corporation (Sector 4 CDC) appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in Southwest Rochester. This quadrant includes the South West Riverfront area and the former Vacuum Oil Refinery site along the Genesee River.

Sector 4 CDC was established as the economic development arm of Sector 4, which includes the five neighborhoods in south west Rochester. Our mission is to build partnerships and collaborations between business, neighborhood and community organizations and provide the tools, talent and techniques to renew, redevelop and rebuild the five commercial corridors in Sector 4. As the city moves toward a quadrant approach, rather than sector, we anticipate expanding our services as the south west quadrant boundaries expand.

Sector 4 CDC is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP, Sector 4 CDC will periodically canvas our five neighborhoods and commercial corridors to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's SW\_Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. Sector 4 CDC is particularly interested in having environmental assessments of properties of concern such as the Vacuum Oil site, community gardens, abandoned dry cleaning establishments and former industrial sites in our neighborhood. In addition, there are vacant, fire-damaged residential and



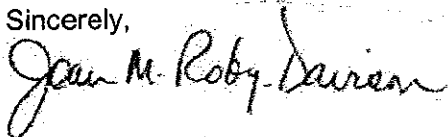
October 13, 2010

commercial buildings in the neighborhood that pose a hazard to nearby residents and may pose environmental hazards as well. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform Sector 4 CDC and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Joan M. Roby-Davison". The signature is written in a cursive, flowing style.

Joan Roby-Davison,  
Director

October 6, 2010

Mr. Mark Gregor, Manager  
Division of Environmental Quality  
City of Rochester, New York  
30 Church Street, Room 300B  
Rochester, NY 14614

Re: City of Rochester, NY Oct. 2010 USEPA Brownfield Assessment Grant Proposal  
Community Brownfield Assistance Program Partnership and Support Letter

Dear Mr. Gregor:

The Park Avenue Landlord Association appreciates the opportunity to collaborate with the City of Rochester's efforts to address vacant and underutilized properties in the southeast quadrant of the City of Rochester. I and my members are continuously looking for rehabilitation or development projects.

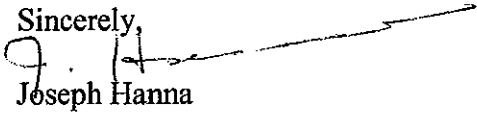
The Landlord Association is very supportive of the City of Rochester's proposed Community Brownfield Assistance Program (CBAP) and the resources that it will provide brownfield assessment services for sites that are important to community groups within the City's four Quadrant Neighborhood Service Centers. We understand that the CBAP will provide site assessment services for three target groups: (1) Private businesses and commercial developers, (2) Profit and not for profit housing developers, and (3) Community groups within the City's four Neighborhood and Development Quadrants.

Under the CBAP, I and my members will periodically canvas our neighborhood/community to identify problematic and strategic tax delinquent, vacant or underutilized brownfield properties. We will then work with the City's Southeast Quadrant Administrator to prioritize the properties for subsequent investigation through the City's Community Brownfield Assistance Program. The Park Avenue Landlord Association is particularly interested in having environmental assessments of properties of concern such as 239-251 North Winton Road and the Alexandria on the corner of East and Alexander in our neighborhood. We will assist the City's environmental consultants by providing property information and concerns. When investigation results such as Phase 1 and Phase 2 assessment reports are completed we will review the results with the City's Quadrant Administrators and Division of Environmental Quality to help plan the next steps for the sites.

We also understand that the City Division of Environmental Quality will inform Park Avenue Landlord Association and the Quadrant Administrators whenever the USEPA approves a site for inclusion in the CBAP, including those sites under investigation for business and developer applicants. This will help make us aware of other investigations and brownfields in our neighborhood. We believe that providing incentives for businesses and developers to consider investing in brownfields in our neighborhood/community is an important aspect of this program.

We encourage the USEPA to accept Rochester's brownfield assessment grant proposal and look forward to working with the City on this program. Please feel free to contact us if we can be of any further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Hanna", with a long, sweeping horizontal line extending to the right.

Joseph Hanna

President

Park Avenue Landlord Association